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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
841 Chestnut Building  
Philadelphia, Pennsylvania 19107-4431

VIA TELEFAX

March 23, 1993

Ms. Sheryl Chesnutt  
Groundwater Technology, Inc.  
223 Wilmington West Chester Pike  
Chadds Ford, PA 19317

Re: Stanley Kessler Superfund Site

Dear Ms. Chesnutt:

Attached are EPA's comments on the Draft Phase I Feasibility Study Report. As we discussed previously, it is appropriate to bring the Phase I Feasibility Study Report and the Phase II Feasibility Study Report together as one document. Therefore it is not necessary for you to respond to these comments in the context of the Phase I Feasibility Study Report but rather in the revised document which will be the Feasibility Study Report for the Site. Therefore the revised Feasibility Study Report is due in thirty days from today's date, i.e. April 22, 1993.

If you have any questions, please do not hesitate to call me at (215) 597-3216.

Sincerely,

Ruth Rzepski  
Remedial Project Manager

cc: J. Newbaker - EPA  
D. Ioven - EPA  
S. Gianti - EPA  
D. Ewald - PADER

AR300958

## Phase I FS Report comments

### 1.1 Purpose and Organization (p. 1-1)

1. An additional reference that should be consulted in preparing the FS is the document entitled "Guidance on Remedial Actions for Contaminated Ground Water at Superfund Sites" (EPA/541/G-88/003).

### 1.3.4.4 Conclusion (p.1-21)

2. It is stated that the upper boundary of the carcinogenic risk range is "not a discreet line at  $1 \times 10^{-04}$ , and that a specific risk estimate around  $10^{-4}$  may be considered acceptable if justified based on site-specific conditions". It should be noted, however, that  $1.0E-04$  is, almost without exception, considered by EPA to be the upper bound for acceptable risk.

### 2.0 Identification and screening of Technologies (p. 2-1)

3. Soil contamination detected during the RI, although minimal, should still be addressed during the FS. The FS should include at a minimum an explanation of why soil remediation is not necessary or discuss the "no action" soil alternative in the screening analysis.
4. It is stated that the risk associated with ingestion of ground water at the site is "small". This is an inaccurate conclusion, however. For a child, the risk associated with exposure to contaminated ground water (via ingestion, inhalation of vapors during bathing, and dermal contact) is  $2.8E-04$ , which exceeds EPA's upper boundary for carcinogenic risk.
5. It is stated on this page that "the medium of concern is ground water when directly ingested as a drinking water supply". It should also be noted in the report that ingestion of contaminated ground water is not the only route of concern; inhalation of vapors and dermal contact with ground water pose an additional risk.
6. It is stated that the results of the BLRA indicate "little or no threat to human health". Again, this is an erroneous conclusion and should be deleted from the report.

### 2.1.2.1 Discussions of Key ARARs and TBCs

7. In this discussion, it should be acknowledged that risk-

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based concentrations could potentially be selected as remediation goals.

### 2.1.3 Summary of Remedial Action Objectives (p. 2-3)

8. The single remedial action objective included in this section would be more accurately stated as follows: "Prevent exposure to site-related volatile organic chemical constituents in ground water at levels above health-based concentrations".

Additional remedial action objectives which should be considered in evaluating response actions include the following:

- Protect uncontaminated ground water and surface water for current and future use
  - Prevent contamination of existing wells that could be affected by the plume and in adjacent groundwater
  - Minimize migration of contaminants within the ground and surface water
  - Minimize migration of contaminants to adjacent ground and surface water
- Restore contaminated ground water for future use
  - Reduce contaminant concentrations within the are of the plume to levels that are safe for drinking
- Protect environmental receptors

*Go ahead with  
the response  
to the  
water*

### 2.2.1 Determination of Quantity to be Remediated (p. 2-3).

9. There is no technical basis for assuming that the areal extent of ground water contamination is limited to the property boundaries. The horizontal extent of ground water contamination is in fact a data gap in the RI given that the furthest downgradient monitoring well (MW-6) exhibits a TCE concentration 26 times the MCL of 5 ppb. The estimated volume of impacted ground water is thus underestimated in the FS. The area of attainment encompasses the area outside the boundary of any waste remaining in place up to the boundary of the contaminant plume.

### 2.2.2 Identification of Applicable Response Actions (p. 2-4).

10. The FS should include an estimated restoration time frame for the no action alternative and for each alternative making it through to the detailed analysis. This

information will aid in evaluating the feasibility for the various alternatives. Guidance on estimating restoration time frames can be found in the document entitled "Guidance on Remedial Actions for Contaminated Ground Water at Superfund Sites" (EPA/540/G-88/003). *Copy enclosed*

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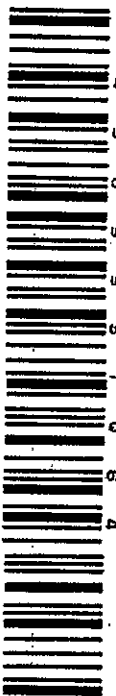
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Department/Floor No.  
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To (Recipient's Name) Please Print  
Ms. Sheryl Chesnut  
Company  
Groundwater Technology, Inc.  
Exact Street Address (No General Delivery to P.O. Boxes or R.O. Zip Codes)  
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Chadds Ford, PA State  
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82 <input type="checkbox"/> PACKAGE	88 <input type="checkbox"/> LETTER	55 <input type="checkbox"/> SATURDAY PICK-UP	56 <input type="checkbox"/> SATURDAY PICK-UP	55 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	56 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	55 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	56 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT
83 <input type="checkbox"/> PACKAGE	89 <input type="checkbox"/> LETTER	56 <input type="checkbox"/> SATURDAY PICK-UP	57 <input type="checkbox"/> SATURDAY PICK-UP	56 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	57 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	56 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	57 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT
84 <input type="checkbox"/> PACKAGE	90 <input type="checkbox"/> LETTER	57 <input type="checkbox"/> SATURDAY PICK-UP	58 <input type="checkbox"/> SATURDAY PICK-UP	57 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	58 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	57 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	58 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT
85 <input type="checkbox"/> PACKAGE	91 <input type="checkbox"/> LETTER	58 <input type="checkbox"/> SATURDAY PICK-UP	59 <input type="checkbox"/> SATURDAY PICK-UP	58 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	59 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	58 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	59 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT
86 <input type="checkbox"/> PACKAGE	92 <input type="checkbox"/> LETTER	59 <input type="checkbox"/> SATURDAY PICK-UP	60 <input type="checkbox"/> SATURDAY PICK-UP	59 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	60 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	59 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	60 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT
87 <input type="checkbox"/> PACKAGE	93 <input type="checkbox"/> LETTER	60 <input type="checkbox"/> SATURDAY PICK-UP	61 <input type="checkbox"/> SATURDAY PICK-UP	60 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	61 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	60 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	61 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT
88 <input type="checkbox"/> PACKAGE	94 <input type="checkbox"/> LETTER	61 <input type="checkbox"/> SATURDAY PICK-UP	62 <input type="checkbox"/> SATURDAY PICK-UP	61 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	62 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	61 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	62 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT
89 <input type="checkbox"/> PACKAGE	95 <input type="checkbox"/> LETTER	62 <input type="checkbox"/> SATURDAY PICK-UP	63 <input type="checkbox"/> SATURDAY PICK-UP	62 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	63 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	62 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	63 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT
90 <input type="checkbox"/> PACKAGE	96 <input type="checkbox"/> LETTER	63 <input type="checkbox"/> SATURDAY PICK-UP	64 <input type="checkbox"/> SATURDAY PICK-UP	63 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	64 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	63 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	64 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT
91 <input type="checkbox"/> PACKAGE	97 <input type="checkbox"/> LETTER	64 <input type="checkbox"/> SATURDAY PICK-UP	65 <input type="checkbox"/> SATURDAY PICK-UP	64 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	65 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	64 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	65 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT
92 <input type="checkbox"/> PACKAGE	98 <input type="checkbox"/> LETTER	65 <input type="checkbox"/> SATURDAY PICK-UP	66 <input type="checkbox"/> SATURDAY PICK-UP	65 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	66 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	65 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	66 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT
93 <input type="checkbox"/> PACKAGE	99 <input type="checkbox"/> LETTER	66 <input type="checkbox"/> SATURDAY PICK-UP	67 <input type="checkbox"/> SATURDAY PICK-UP	66 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	67 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	66 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	67 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT
94 <input type="checkbox"/> PACKAGE	100 <input type="checkbox"/> LETTER	67 <input type="checkbox"/> SATURDAY PICK-UP	68 <input type="checkbox"/> SATURDAY PICK-UP	67 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	68 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	67 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	68 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT
95 <input type="checkbox"/> PACKAGE	101 <input type="checkbox"/> LETTER	68 <input type="checkbox"/> SATURDAY PICK-UP	69 <input type="checkbox"/> SATURDAY PICK-UP	68 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	69 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	68 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	69 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT
96 <input type="checkbox"/> PACKAGE	102 <input type="checkbox"/> LETTER	69 <input type="checkbox"/> SATURDAY PICK-UP	70 <input type="checkbox"/> SATURDAY PICK-UP	69 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	70 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	69 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	70 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT
97 <input type="checkbox"/> PACKAGE	103 <input type="checkbox"/> LETTER	70 <input type="checkbox"/> SATURDAY PICK-UP	71 <input type="checkbox"/> SATURDAY PICK-UP	70 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT	71 <input type="checkbox"/> 100 LBS. MAXIMUM WEIGHT		